

DGR:MRG/JOE
F. #2020R01065

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

THOMAS HOWELL,

Defendant.

----- X

I N F O R M A T I O N

Cr. No. 1:23-cr-343-FB
(T. 18, U.S.C., §§ 982(a)(1), 982(b)(1),
1960(a), 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p))

THE UNITED STATES ATTORNEY CHARGES:

OPERATION OF AN UNLICENSED MONEY TRANSMITTING BUSINESS

1. In or about and between May 2014 and December 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant THOMAS HOWELL, together with others, did knowingly conduct, control, manage, supervise, direct and own all and part of an unlicensed money transmitting business affecting interstate and foreign commerce, to wit: a network of United States-based money transmitting individuals, which (a) operated without an appropriate money transmitting license in the State of Arizona, where such operation is punishable as a misdemeanor and a felony under Arizona State law; and (b) failed to comply with the money transmitting business registration requirements under Title 31, United States Code, Section 5330 and regulations prescribed thereunder.

(Title 18, United States Code, Sections 1960(a), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(1), which requires any person convicted of such offense to forfeit any property, real or personal, involved in such offense, or any property traceable to such property.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other

property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(1) and 982(b)(1); Title 21, United States Code, Section 853(p))

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2020R01065
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

THOMAS HOWELL,

Defendant.

INFORMATION

(T. 18, U.S.C., §§ 982(a)(1), 982(b)(1), 1960(a), 2 and 3551 et seq.; T.
21, U.S.C., § 853(p))

A true bill.

Foreperson

Filed in open court this ----- *day,*

of ----- *A.D. 20* -----

Clerk

Bail, \$ -----

Matthew R. Galeotti, John O. Enright Assistant U.S. Attorneys (718) 254-7000